

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

NATIONAL INSTITUTE OF FAMILY  
AND LIFE ADVOCATES et al.,

Plaintiffs,

v.

KWAME RAOUL, in his official capacity  
as Attorney General of the State of Illinois,

Defendant.

No. 3:23-cv-50279

Honorable Iain D. Johnston,  
District Judge

Honorable Lisa A. Jensen,  
Magistrate Judge

**JOINT MOTION FOR EXTENSION OF TIME AND  
TO CONVENE A SETTLEMENT CONFERENCE**

The parties jointly move the Court to extend the deadline for Plaintiffs to file a motion seeking the costs of litigation, including reasonable attorneys' fees and expenses under 42 U.S.C. § 1988 ("fees and costs motion"), and respectfully move that the Court convene a Settlement Conference, either before District Judge Johnston or Magistrate Judge Jensen, to assist the parties in resolving their remaining differences and reaching a negotiated settlement of the fees and costs motion.

On December 14, 2023, the Court entered an agreed permanent injunction order providing, among other things, Plaintiffs could file their fees and costs motion within 30 days. ECF 44. On January 5, 2024, the Court granted an agreed motion to extend that deadline to February 14, 2024, and on February 9, 2024, the Court granted a joint motion to extend that deadline to March 15, 2024, to allow the parties sufficient time to explore a negotiated resolution regarding fees and costs. ECF 46 & 48. In that time, the parties have exchanged extensive position papers on the various issues, and they have diligently engaged in negotiations to reach a resolution regarding fees and costs. At this time, the parties believe that a settlement conference

would assist them in resolving remaining issues, and they thus jointly move that the Court (1) convene a Settlement Conference, either before District Judge Johnston or Magistrate Judge Jensen, and (2) extend the time to file the fees and costs motion (if necessary) until 30 days after the conclusion of that Settlement Conference.

Dated: March 15, 2024

/s/ Peter Breen

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Respectfully submitted,

/s/ Darren Kinkead (with permission)

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